

EXHIBIT D

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In Re: New York City Policing
During Summer 2020 Demonstrations

20-cv-8924 (CM)(GWG)

This filing is related to:

ALL CASES

**SECOND CONSOLIDATED
NOTICE OF DEPOSITION
PURSUANT TO FED. R. CIV. P.
30(b)(6)**

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Plaintiffs in the above-captioned cases will take the deposition(s) upon oral examination of Defendant, City of New York (the “City”), through one or more agents or other representatives who shall be designated to testify on the City’s behalf, regarding all information known or reasonably available to the City with respect to the Topics for Deposition identified in the attachments below. The City shall designate the person or persons most knowledgeable and prepared to testify on behalf of the City concerning the Topics for Deposition set out in the attached Attachment A. Plaintiffs request that the City provide written notice at least five (5) business days before the deposition of (1) the name(s), (2) the employment position(s), and (3) the Topics for Deposition about which each designated individual shall testify on the City’s behalf.

This deposition(s) shall commence on August 11, 2022, at the Office of the New York State Attorney General, located at 28 Liberty Street, 16th Floor, New York, New York, or at another location to be determined by Plaintiffs, or by remote means (via videoconference) pursuant to Rule 30(b)(4) of the Federal Rules of Civil Procedure, and shall continue from day to

day until completion. This deposition(s) shall take place before a notary public or other officer authorized by law to administer oaths.

Pursuant to Rule 30(b)(3)(A) of the Federal Rules of Civil Procedure, the deposition will be recorded by a court reporter and/or audiovisual means.

PLEASE TAKE FURTHER NOTICE that, pursuant to Rule 34 of the Federal Rules of Civil Procedure, Defendants are required to produce, by electronic delivery, in advance of any given deposition, any and all materials in any form they may have related in any way to the subject matter of that deposition.

You are invited to attend and cross-examine.

Dated: July 7, 2022
New York, New York

LETITIA JAMES
Attorney General of the State of New York

By: /s/ Lillian Marquez
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ATTACHMENT A

DEFINITIONS

1. “Arrest” means an Officer’s seizure, detention, or arrest of a person, including but not limited to for the purpose of issuing them a criminal court or C-Summons (“summons”) or Desk Appearance Ticket (“DAT”) or fully processing them for arraignment.
2. “Curfew Orders” means New York City Mayor Bill de Blasio’s Emergency Executive Orders Nos. 117-119, which imposed curfews in New York City between June 1 and June 7, 2020. The Curfew Orders exempted certain categories of workers that were deemed “essential” (“Essential Workers”), including “police officers, peace officers, firefighters, first responders and emergency medical technicians, individuals travelling to and from essential work and performing essential work, people experiencing homelessness and without access to a shelter, and individuals seeking medical treatment or medical supplies.” Each of the Curfew Orders provided: “Failure to comply with this Order shall result in orders to disperse, and any person who knowingly violates the provisions in this Order shall be guilty of a Class B misdemeanor” under NYC Administrative Code (“AC”) § 3-108. AC § 3-108 contains a knowing intent requirement, as follows: “Any knowing violation of a provision of any emergency measure established pursuant to this chapter shall be a class B misdemeanor punishable by a fine of not more than five hundred dollars, or by imprisonment for not more than three months, or both.”
3. “Kettling,” “kettling tactics” and “encirclement” mean any and all plans, methods, procedures, tactics, strategies, or approaches, by whatever name or characterization, utilized by NYPD to control crowds, address disorderly conduct, and/or effectuate mass arrests and detentions, whether intentional or not, whereby Officers physically surround or otherwise

contain members of the public within an area, leaving them few or no routes of unimpeded egress.

4. “Legal Observer” means an individual who attends a public demonstration to observe and document interactions between law enforcement and demonstrators.
5. “Officer” means a member of service or civilian employee of the NYPD, regardless of rank, including but not limited to any and all officers, detectives, sergeants, lieutenants, captains, inspectors, chiefs, and/or deputy commissioners.
6. “Prosecution” means any actual or potential prosecution of a person arrested related to the Summer 2020 Protests.
7. “Protest-Related Violation or Offense” means an alleged violation of any of the following laws during a demonstration or protest: New York State Vehicle and Traffic Law (“VTL”) Section 1156(a) (Pedestrians in Roadways); New York State Penal Law (“PL”) Section 240.05 (Riot in the Second Degree); PL Section 240.10 (Unlawful Assembly); PL Section 205.30 (Resisting Arrest); PL Section 195.05 (Obstruction of Governmental Administration in the Second Degree); PL Section 240.20(5) (Disorderly Conduct – Blocking Vehicular or Pedestrian Traffic); PL Section 240.20(6) (Disorderly Conduct – Refusing to Obey a Lawful Dispersal Order); New York City Administrative Code (“NYAC”) Section 3-108 (Executive Order Violation); and NYAC Section 10-110(c) (Parading Without a Permit), and any other offenses with which any individual who participated in any racial justice protests between May 28, 2020 and January 31, 2021 was actually arrested for and/or charged.
8. “Relevant Policies and Procedures” refers to the policies and procedures of the New York City Police Department and the City concerning:
 - a) Officers’ use of tactics or objects to control crowds during a demonstration or protest;

- b) Officers' use of force, including batons or other instruments, during a demonstration or protest;
- c) Use of force reporting and investigations related to uses of force during a demonstration or protest;
- d) *[blank per the parties' agreed amendments]*
- e) Officers' tactical use of other objects, such as shields and bicycles, during a demonstration or protest;
- f) Officers' use of Oleoresin Capsicum (also known as "OC" or "pepper spray") during a demonstration or protest;
- g) Technical Assistance Response Unit ("TARU") video and audio recording related to a demonstration or protest;
- h) Strategic Response, Strategic Response Group ("SRG"), and Disorder Control Unit operations;
- i) Policing operations, including traffic safety, crowd and disorder control operations, during a demonstration or protest; including use of tactics or encirclement during a demonstration or protest
- j) Officers' use of body worn cameras during a demonstration or protest;
- k) Officers' use of zip-ties or flex cuffs during a demonstration or protest;
- l) *[blank per the parties' agreed amendments]*
- m) Officers' interaction with, and treatment of, Legal Observers during a demonstration or protest;
- n) Officers' interaction with, and treatment of, journalists, reporters, photographers, and members of the press during a demonstration or protest;
- o) Officers' enforcement of any applicable curfews in place during a demonstration or protest, such as the Curfew Orders, including, but not limited to:
 - a. The requirements in the Curfew Orders to give dispersal orders and opportunities to disperse prior to Arrests or Prosecutions for violations of the Curfew Orders;
 - b. The exemptions contained in the Curfew Orders for Essential Workers, including, but not limited to:
 - i. Identifying Essential Workers;
 - ii. The treatment of Legal Observers as Essential Workers; and
 - iii. Allowing Essential Workers who have been arrested related to purported violations of the Curfew Orders to disperse;

- c. Any requirements or prerequisites for an Officers' initiating an Arrest or prosecution related to a purported violation of the Curfew Orders, including, but not limited to, any requirements that the Officer have personally observed, or be able to identify an Officer who personally observed, a purported violation of the Curfew Orders prior to an Arrest or Prosecution related to a protest violation.
- p) Incident command, chain of command, and command and control during a demonstration or protest and the Summer 2020 Protests; [Covered in deposition topic 6]
- q) Facilitation, accommodation, and escort of demonstrations or protests;
- r) Constitutional rights of people engaged in protests or demonstrations under the First, Fourth, and Fourteenth Amendments, including the need to provide fair warning before making certain Arrests or engaging in certain uses of force;
- s) The need to give dispersal orders and a meaningful opportunity to comply with them before making Arrests for a Protest-Related Violation or Offense at a demonstration or protest;
- t) Racial profiling and Officers' use of race in law enforcement decisions and/or implicit bias
- u) [*blank per the parties' agreed amendments*]
- v) Officers' use of racial slurs or epithets;
- w) Officers' affiliation with or participation in groups or website that promote racists views;
- x) Officers' Arrest of individuals during a demonstration or protest, including procedures for effecting and processing large-scale or mass arrests and use of mass or large-scale arrest processing;
- y) Probable cause to Arrest for a Protest-Related Violation or Offense;
- z) Discretion to Arrest for a Protest-Related Violation or Offense;
- aa) When to process an Arrest for a Protest-Related Violation or Offense for release with a summons or Desk Appearance Ticket, or for arraignment, including during a demonstration or a protest;
- bb) Officers' transportation of people arrested during or after a demonstration or protest;
- cc) [*blank per the parties' agreed amendments*]
- dd) Officers' provision of medical aid to civilians injured during a demonstration or protest;

- ee) Medical aid reporting and investigations related to provision of medical aid or the failure to provide or report such aid, as well as the failure to provide or report civilians injured during a demonstration or protest;
 - ff) Officers' wearing of face coverings when interacting with the public during or after a demonstration or protest, including during arrest processing; and
 - gg) Any other policies, procedures, directives or training associated with policing large-scale events, including protests, demonstrations, and events involving civil disobedience.
9. "Summer 2020 Protests" means the protests, demonstrations, and gatherings at each of the "Protest Locations" identified in "Attachment B" hereto.
10. "Preservation Notice" means any notice the City or any of its agencies received or created to preserve Documents concerning the Summer 2020 Protests, including, but not limited to:
- a) July 6, 2020 letter from Cohen&Green P.L.L.C., a copy of which is available at DEF_E_PD_00072536;
 - b) July 6, 2020 letter from Rickner PLLC, a copy of which is available at DEF_E_PD_00072510; and
 - c) July 6, 2020 letter from the Legal Aid Society referenced in the June 9, 2022 Declaration of Bridget Fitzpatrick.
11. "Footage" refers to all camera footage that is under the control of the City by or through its agencies concerning the Summer 2020 Protests and/or the NYPD, including, but not limited to footage filmed by NYPD ARGUS cameras, Body Worn Cameras, Aviation, TARU, Dashboard, cameras affixed onto or in precinct buildings, police vehicles, or other City property.
12. "Notices of Claim" refers to all Notices of Claim as that term is used in N.Y.S. Gen. Mun. L. § 50-e and the related sections received by New York City and its agencies concerning the Summer 2020 Protests.

13. “Document Storage Protocols” refers to policies, practices, and technical information, relating to the collection, storage, preservation, replacement (through overwriting), and deletion of Documents, including but not limited, to those concerning:

- a) Storage, replacement, deletion, and other management of Footage, including but not limited to Footage relating to the Summer 2020 Protests;
- b) Issuance of internal notices to preserve Footage or other Documents, including events that trigger the issuance of such notices, effect of the receipt of Notices of Claim, and the procedure for preserving Documents both in general and specifically as related to the Summer 2020 Protests;
- c) Hardware capacity for storing Footage and other Documents;
- d) Staffing and technological capabilities concerning the creation, contemporaneous monitoring, storage, review, preservation, replacement, and deletion of Footage;
- e) Ordinary deletion schedules for Footage and other Documents;
- f) Technical capacity to pause ordinary deletion schedules for Footage and other Documents; and
- g) Any and all responses to Preservation Notices.

TOPICS FOR DEPOSITION

Topic No. 23: The City’s Document Storage Protocols for Footage.

Topic No. 24: To the extent not covered by Topic No. 23, the process of preserving Footage relevant to these Actions, including but not limited to:

- a) Video Retrieval Requests made by any City agency or employee thereof for Footage concerning the Summer 2020 Protests;
- b) the receipt and dissemination of the Preservation Notices by and to agents of the City;
- c) the process by which the City, through its agents, identified Footage to preserve in response to the Preservation Notices, including the individuals responsible for

those decisions, the criteria considered for preservation, and what Documents may exist that relate to this process;

- d) the specific steps taken to preserve Footage by the City, including but not limited to notifications and instructions disseminated to NYPD the technical actions taken to protect that Footage from deletion; and
- e) the cause for the replacement, deletion or other destruction of Footage related to the Summer 2020 Protests, including but not limited to any determinations or discussions concerning the need to preserve Footage of protests after June 8, 2020;

Topic No. 25: The City's receipt of, processing of, and any related preservation efforts concerning Notices of Claim.

Topic No. 26: The City's, including specifically the NYPD's, general policies, procedures, and process of ensuring evidence is not destroyed in response to a preservation letter.

Topic No. 27: The City's, including specifically the NYPD's, general policies, procedures, and process of ensuring evidence is not destroyed in response to a notice of claim.

Topic No. 28: The City's, including specifically the NYPD's, general policies, procedures, and process of ensuring evidence is not destroyed in response to an internal or criminal investigation.

Attachment B: List of Protest Locations¹

<u>Protest No.</u>	<u>Date</u>	<u>Approximate Location</u>	<u>Complaint Allegations</u>
1	May 28, 2020	Lafayette Street to City Hall, Manhattan	<i>People</i> , ¶ 51 <i>Sow</i> , ¶ 65
2	May 28, 2020	Union Square, Manhattan	<i>People</i> , ¶¶ 128-132 <i>Payne</i> , ¶ 44 <i>Sow</i> , ¶ 65
3	May 29, 2020	Foley Square Manhattan to Near Barclays Center, Brooklyn via Brooklyn Bridge	<i>People</i> , ¶¶ 52, 193-195, 196-202 <i>Payne</i> , ¶ 45 <i>Sow</i> , ¶ 65 <i>Wood</i> , ¶¶ 45-47
4	May 29, 2020	Clinton Hill, Brooklyn	<i>People</i> , ¶¶ 52, 133-140, 223-226
5	May 29, 2020	Fort Greene, Brooklyn	<i>People</i> , ¶ 52
6	May 29, 2020	Bedford-Stuyvesant, Brooklyn (Herbert von King Park), Brooklyn	<i>People</i> , ¶¶ 141-149, 161-163
7	May 29, 2020	Pacific Street and Flatbush Avenue, Brooklyn	<i>People</i> , ¶¶ 215-219 <i>Wood</i> , ¶¶ 48-50
8	May 29, 2020	Union Square, Manhattan	<i>People</i> , ¶ 52
9	May 29, 2020	Herald Square, Manhattan	<i>People</i> , ¶ 52
10	May 30, 2020	Jackson Heights, Queens	<i>People</i> , ¶ 53
11	May 30, 2020	Park Slope, Brooklyn	<i>People</i> , ¶ 53
12	May 30, 2020	East Flatbush, Brooklyn	<i>People</i> , ¶¶ 53, 312-317 <i>Sow</i> , ¶ 67
13	May 30, 2020	Near Bedford & Tilden Aves., Brooklyn	<i>People</i> , ¶¶ 178-192, 235-236
14	May 30-31, 2020	Barclays Center to Flatbush Extension, Brooklyn	<i>People</i> , ¶¶ 203-207, 107-114 <i>Payne</i> , ¶¶ 47-48, 107-115
15	May 30, 2020	Harlem / West Side Highway, Manhattan	<i>People</i> , ¶¶ 402-407
16	May 30, 2020	Union Square to FDR Drive/Lower East Side, Manhattan	<i>Payne</i> , ¶¶ 50, 117-123 <i>Sow</i> , ¶¶ 130-151
17	May 30, 2020	City Hall to Brooklyn Bridge, Manhattan	<i>Sow</i> , ¶¶ 152-177
18	May 31, 2020	Near Barclays Center, Brooklyn	<i>People</i> , ¶ 54 <i>Sow</i> , ¶ 68

¹ The allegations listed in this table reference those in the Amended Complaints in *People*, No. 21 Civ. 322 (ECF No. 51), *Payne*, No. 20 Civ. 8224 (ECF No. 54), *Sierra*, No. 20 Civ. 10291 (ECF No. 38), *Sow*, 21 Civ. 533 (ECF No. 49) and *Wood*, 20 Civ. 10541 (ECF No. 48) and the Complaint in *Yates*, No. 21 Civ. 1904 (ECF No. 1).

<u>Protest No.</u>	<u>Date</u>	<u>Approximate Location</u>	<u>Complaint Allegations</u>
19	May 31, 2020	Downtown Brooklyn to multiple bridges	<i>People</i> , ¶ 54
20	May 31, 2020	Brooklyn Bridge	<i>People</i> , ¶ 54
21	May 31, 2020	From Manhattan Bridge to Chinatown, Church Avenue, and/or across Canal Street, Manhattan	<i>People</i> , ¶ 54 <i>Yates</i> , ¶¶ 13-21 <i>Wood</i> , ¶¶ 51-54
22	May 31, 2020	Near Williamsburg Bridge, Manhattan	<i>People</i> , ¶ 54
23	May 31, 2020	Broadway to E. 11 th St. & Near Union Square, Manhattan	<i>People</i> , ¶¶ 155-160, 231-234 <i>Payne</i> , ¶¶ 125-130
24	May 31, 2020	Times Square, Manhattan	<i>People</i> , ¶ 54
25	May 31, 2020	F.D.R. Drive, Manhattan	<i>People</i> , ¶¶ 208-210
26	June 1, 2020	Midtown, Manhattan	<i>People</i> , ¶¶ 55, 227-230 <i>Payne</i> , ¶ 53 <i>Sow</i> , ¶¶ 208-219
27	June 1, 2020	East Village, Manhattan	<i>People</i> , ¶ 55
28	June 1, 2020	Near Union Square Park, Manhattan	<i>People</i> , ¶ 55 <i>Payne</i> , ¶ 53
29	June 1, 2020	Near Barclays Center, Brooklyn, Crossing Manhattan Bridge into Times Square & Near Port Authority, Manhattan	<i>People</i> , ¶ 55 <i>Sow</i> , ¶¶ 180-206
30	June 1, 2020	Fordham Manor, Bronx	<i>People</i> , ¶ 55
31	June 1, 2020	Astoria Park, Queens	<i>People</i> , ¶ 55
32	June 1, 2020	Flushing, Queens	<i>People</i> , ¶ 55
33	June 2, 2020	Lower Manhattan/Foley Square to Central Park, Manhattan	<i>People</i> , ¶¶ 56, 318-323 <i>Payne</i> , ¶¶ 131-136
34	June 2, 2020	Union Square, Manhattan	<i>People</i> , ¶¶ 56
35	June 2, 2020	Near Barclays Center, Brooklyn to Manhattan Bridge	<i>People</i> , ¶¶ 330-336
36	June 2, 2020	Upper West Side, Manhattan	<i>People</i> , ¶¶ 56, 423-430
37	June 2, 2020	Astor Place, Manhattan	<i>People</i> , ¶ 56
38	June 2, 2020	Chelsea, Manhattan	<i>People</i> , ¶ 56 <i>Payne</i> , ¶ 54
39	June 2, 2020	Near West Side Highway, Manhattan	<i>Payne</i> , ¶ 54 <i>Sow</i> , ¶¶ 220-237, 239-282
40	June 2, 2020	Bryant Park to Midtown, Manhattan	<i>People</i> , ¶ 57 <i>Wood</i> , ¶¶ 55-59
41	June 3, 2020	Cadman Plaza, Brooklyn	<i>People</i> , ¶¶ 57, 164-168, 337-346 <i>Payne</i> , ¶¶ 55, 143-159

<u>Protest No.</u>	<u>Date</u>	<u>Approximate Location</u>	<u>Complaint Allegations</u>
			<i>Sow, ¶ 83</i> <i>Wood, ¶¶ 65-66</i>
42	June 3, 2020	Maria Hernandez Park, Brooklyn	<i>People, ¶ 57</i>
43	June 3, 2020	Midtown East/Upper East Side, Manhattan	<i>People, ¶¶ 57, 237-246, 347-354</i> <i>Sow, ¶ 84-85, 284-309</i> <i>Wood, ¶¶ 60-64</i>
44	June 4, 2020	Mott Haven, Bronx	<i>People, ¶¶ 58, 169-170, 247-255, 284-310, 366-387</i> <i>Wood, ¶¶ 116-167</i> <i>Payne, ¶¶ 59-65, 161-173, 182-192, 194-200</i> <i>Sierra, ¶¶ 41-124</i> <i>Sow, ¶¶ 86-93, 310-329, 332-345, 348-390, 392-418</i>
45	June 4, 2020	McCarren Park to South Williamsburg, Brooklyn	<i>People, ¶¶ 355-365</i> <i>Payne, ¶¶ 58, 202-206</i> <i>Wood, ¶¶ 67-68</i> <i>Sow, ¶ 84-85</i>
46	June 4, 2020	Clinton Hill and Prospect Heights, Brooklyn	<i>People, ¶ 59</i>
47	June 4, 2020	Flatbush, Brooklyn	<i>People, ¶ 59</i>
48	June 4, 2020	Brooklyn Bridge	<i>People, ¶ 59</i>
49	June 4, 2020	Midtown, Manhattan	<i>People, ¶ 59</i>
50	June 4, 2020	Flushing, Queens	<i>People, ¶ 59</i>
51	June 4, 2020	Central Park West, Manhattan	<i>People, ¶ 59</i>
52	June 5, 2020	Crown Heights, Brooklyn	<i>People, ¶ 60</i>
53	June 5, 2020	Sunset Park, Brooklyn	<i>People, ¶ 60</i>
54	June 5, 2020	Staten Island	<i>People, ¶ 60</i>
55	June 5, 2020	Near Gracie Mansion, Manhattan	<i>People, ¶ 60</i>
56	June 5, 2020	Barclays Center to Downtown Brooklyn	<i>People, ¶ 60</i>
57	June 5, 2020	Nostrand Ave., Brooklyn	<i>Payne, ¶ 71</i>
58	June 6, 2020	Financial District, Manhattan	<i>People, ¶ 61</i>
59	June 7, 2020	Upper East Side, Manhattan	<i>People, ¶ 61</i>
60	June 8, 2020	Times Square, Manhattan	<i>People, ¶ 61</i>
61	June 14, 2020	Times Square, Manhattan	<i>Payne, ¶ 74</i>
62	June 28, 2020	Foley Square to West Village, Manhattan (incl. Washington Square Park)	<i>People, ¶ 62</i> <i>Payne, ¶¶ 78, 174-180, 209-210</i>
63	June 23-30, 2020	City Hall Park, Manhattan	<i>Payne, ¶ 74</i>

<u>Protest No.</u>	<u>Date</u>	<u>Approximate Location</u>	<u>Complaint Allegations</u>
64	July 3, 2020	City Hall Park, Manhattan	<i>People</i> , ¶ 63
65	July 11, 2020	Dyker Heights, Brooklyn	<i>Sow</i> , ¶ 101
66	July 12, 2020	Bay Ridge, Brooklyn	<i>Sow</i> , ¶ 102
67	July 15, 2020	Brooklyn Bridge Pedestrian Path	<i>People</i> , ¶¶ 408-421
68	July 28, 2020	Kips Bay, Manhattan	<i>People</i> , ¶ 64
69	September 11, 2020	McCarren Park, Brooklyn	<i>People</i> , ¶ 65
70	September 17, 2020	Foley Square, Manhattan	<i>Payne</i> , ¶ 76
71	September 19, 2020	Times Square, Manhattan	<i>Payne</i> , ¶ 77
72	September 26, 2020	Washington Square Park and Near Sixth Precinct Stationhouse, Manhattan	<i>People</i> , ¶ 66
73	October 6, 2020	Borough Park, Brooklyn	<i>Sow</i> , ¶ 103
74	October 7, 2020	Bedford-Stuyvesant, Brooklyn	<i>People</i> , ¶ 67
75	October 25, 2020	Coney Island, Brooklyn to near Trump Tower, Manhattan, to Brooklyn Park	<i>Sow</i> , ¶ 104
76	November 1, 2020	Hell's Kitchen, Manhattan	<i>Sow</i> , ¶ 105
77	November 4, 2020	Washington Square Park, W. 8 th and Greenwich Ave., Manhattan	<i>People</i> , ¶¶ 68, 388-389
78	November 4, 2020	Central Park to Union Square, Manhattan	<i>People</i> , ¶ 68, 390-393 <i>Payne</i> , ¶ 78
79	November 5, 2020	West Village to Union Square, Manhattan	<i>People</i> , ¶ 69 <i>Payne</i> , ¶ 79
80	December 2, 2020	Staten Island	<i>Sow</i> , ¶ 106
81	December 11, 2020	Downtown Brooklyn	<i>People</i> , ¶ 70
82	January 12-16, 2021	Downtown Brooklyn	<i>Payne</i> , ¶ 138
83	January 18, 2021	Barclays Center, Brooklyn to City Hall Park, Manhattan	<i>People</i> , ¶¶ 71, 112-113 394-398 <i>Payne</i> , ¶¶ 80, 139-140